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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

| | | |
|------------------|---|--------------------------|
| In Re: | § | |
| Trent Lee Crain | § | Case No. 13-70302-hdh-13 |
| Wendy Lane Crain | § | Chapter 13 |
| Debtors | § | |

DEBTORS' MOTION TO EXTEND AUTOMATIC STAY

Come Now Debtors, by counsel, and for this Motion state as follows:

1. Debtors filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtors were debtors in a prior case during the preceding year. To-wit: Chapter 13, Case No. 12-70153-HDH-13 filed on April 25, 2012.
3. Debtors seek an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtors' prior case was dismissed for: Debtors were paying \$1,046.00 monthly to the Trustee. They chose to dismiss their case and attempt to work directly with the creditors. The unsecured creditors were not willing to negotiate a settlement to satisfy the outstanding debts.
5. The following changes of circumstances demonstrate that the Debtors' can perform this plan and are likely to complete the case successfully: Debtors are re-filing in order to pay their unsecured creditors 100% for 60 months at \$681.00 monthly. The payment will be deducted to from his pay check. They will pay both vehicles direct.

WHEREFORE, Debtors request this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White, Attorney for Debtors

CERTIFICATE OF CONFERENCE

On August 7, 2013, the Office of Monte J. White & Associates, P.C., contacted Marc McBeath, Counsel for the Chapter 13 Trustee and was advised that the Trustee does not oppose the motion.

/s/Monte J. White, Attorney for Debtors

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on August 20, 2013, on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtors

Aspire
Po Box 105555
Atlanta, GA 30348

Global Acceptnc Credit Company
5850 W I-20
Arlington, TX 76017

United Revenue Corp
Attention: Office Manager
204 Billings St. Suite 120
Arlington, TX 76010

Asset Acceptance Llc
Attention: Bankruptcy
PO Box 2036
Warren, MI 48090

IRS Special Procedures
1100 Commerce St., Room 951
Mail Stop 5029 DAL
Dallas, TX 75246

Wendy Lane Crain
506 W Inwood Dr
Wichita Falls, TX 76301

Bank of America
450 American St
Simi Valley, CA 93065

Jefferson Capital
16 McLeland Rd
Saint Cloud, MN 56303

Barclays Bank Delaware
Attention: Bankruptcy
PO Box 1337
Philadelphia, PA 19101

Jefferson Capital Systems LLC
PO Box 7999
Saint Cloud, MN 56302-9617

Capital One, N.a.
Capital One Bank (USA) N.A.
PO Box 30285
Salt Lake City, UT 84130

Midland Funding
8875 Aero Dr Ste 200
San Diego, CA 92123

Citimortgage Inc
Attn: Bankruptcy
PO Box 140609
Irving, TX 75014

Oak Harbor Capital VI, LLC
c/o Weinstein & Riley PS
2001 Western Ave, Ste 400
Seattle, WA 98121

Executive Services
PO Box 2248
Wichita Falls, TX 76307

Paramount Recovery
Attn: Bankruptcy
PO Box 788
Lorina, TX 76655

First Premier Bank
PO Box 2208
Vacaville, CA 95696

Portfolio Recovery Associates, L
Att Bankruptcy
PO Box 41067
Norfolk, VA 23541

Ford Motor Credit
PO Box 640001 DF
Dallas, TX 75364-0001

Trent Lee Crain
506 W Inwood Dr
Wichita Falls, TX 76301

Gemb/walmart
Attn: Bankruptcy
PO Box 103104
Roswell, GA 30076

Union Square
1401 Holliday St.
Wichita Falls, TX 76301